

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COUNTER TERRORIST GROUP US,  
COUNTEER GROUP, and J. K. IDEMA,

Plaintiffs,

- against -

AUSTRALIAN BROADCASTING CORP.;  
a/k/a ABC AUSTRALIA; ABC  
CORPORATIONS 1-100; LIZ JACKSON;  
ERIC CAMPBELL; JOSEPH A CAFASSO;  
EDWARD A. ARTIS; KNIGHTSBRIDGE  
INTERNATIONAL, INC.; KNIGHTSBRIDGE  
INTERNATIONAL HUMANITARIAN  
RELIEF AND HUMAN IMPROVEMENT  
PROGRAMS, INC.; ROBERT C. MORRIS;  
PARTNERS INTERNATIONAL  
FOUNDATION; WILLIAM JOHN HAGLER,  
Both Individually and Severally, and DOES 1  
through 7, inclusive,

Defendants.

08 Civ 2356 (DAB)

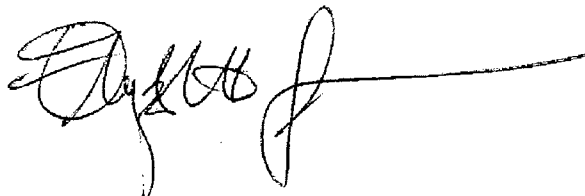
**DECLARATION OF  
LIZ JACKSON**

LIZ JACKSON declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a senior reporter for defendant the Australian Broadcasting Corporation ("ABC") in the above-captioned action. I submit this affidavit in support of the motion to dismiss the Complaint herein filed by the ABC and by me on the grounds of, *inter alia*, lack of subject matter jurisdiction and/or the doctrine of *forum non conveniens*, and also in support of my motion to dismiss this action as against me for lack of personal jurisdiction.

2. I am a resident and citizen of Australia. I was born in Melbourne, Victoria and now reside in Sydney, New South Wales, Australia. I have resided in Sydney since 1983. I have never resided in the United States.

3. I have been employed as a journalist by the Australian Broadcasting Corporation since 1986. My work at the ABC has earned several awards, including five Walkley Awards for



Excellence in Journalism and three "Logies", which are roughly the Australian equivalent of American "Emmy" awards. I am currently employed as a reporter on the current affairs program *Four Corners*. I have reported on topics ranging from military disasters, mandatory sentencing laws and inadequate services for children, to scandals in professional sports and Australian Aboriginal activism.

4. My work for the ABC provides my primary source of income. I derive no income from international commerce. When I travel outside Australia for news reporting purposes, I travel as a reporter and agent of the ABC, and I am, at all times, paid as an ABC employee residing in Australia.

**NO CONNECTION TO NEW YORK**

5. I do not own any interest in any U.S. business, and I have no investment in any public or private U.S. corporate entity or partnership.

6. I do not maintain a website in my individual capacity.

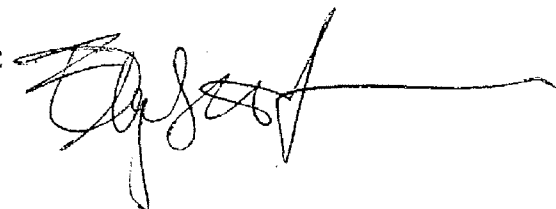
7. I conduct no business in the State of New York, or, for that matter, in the United States.

8. I do not reside (nor have I ever resided) in New York, and I do not pay (nor have I ever paid) taxes to the State of New York.

9. I do not maintain any address or possess any real estate in New York, nor do I maintain a telephone number in New York.

10. I do not have a place of business in New York, nor am I registered to do business in New York.

11. I do not maintain any office, bank accounts, or other financial accounts or other tangible or intangible assets in New York.

A handwritten signature in black ink, appearing to be "E. J. [unclear]", with a long horizontal line extending to the right.

12. I have visited New York for news reporting purposes on only four occasions. The last time I was in New York was in 2004 – before the *Media Watch* program at issue in this case was prepared.

13. I have also visited New York on one occasion for personal vacation, and that was in about 1980.

14. Travel to New York to defend this case would cause severe hardship professionally and personally. I am an active full-time news and current affairs reporter, which regularly requires me to interview news subjects in person, usually in Australia but sometimes elsewhere. As part of my duties I am required to be available to cover breaking stories at short notice and in person. Being required to travel to New York and spend time in New York for the defense of this matter would adversely affect my capacity to fulfill this important aspect of my duties. Further, as mentioned earlier, I work on the ABC program titled *Four Corners*. *Four Corners* is the ABC's flagship current affairs program and could be described as something akin to a program such as the CBS *60 Minutes* program in the United States. *Four Corners* is a weekly 45-minute broadcast with high news production values, and it is staffed by only five full-time reporters and two part-time reporters. My absence would adversely affect the capacity of the *Four Corners* team to maintain the quality of its productions.

#### **MEDIA WATCH**

15. I was the host of *Media Watch*, a weekly program on the ABC, from March 2005 to December 2005. *Media Watch* is a program dedicated to analysis and criticism of the media, examining and commenting on previously published and broadcast reports or programs.

16. I was the presenter of the *Media Watch* segment entitled "*Jack of All Trades*," first broadcast on March 7, 2005 (the "Program"). As presenter, I generally did not conduct

original research or investigation for *Media Watch* stories. I did not conduct any original research or investigation for the "*Jack of All Trades*" story.

17. I never traveled to New York or the United States in connection with *Media Watch*.

18. Anne Delaney was the story editor for the Program. I spoke with Ms. Delaney on several occasions about the Program and collaborated in writing the script for the story.

19. I understand that Ms. Delaney and others at the ABC conducted research for the Program, spoke with certain individual sources, and obtained documents referenced in the Program. I do not know where those documents came from or where any sources were located.

20. I did not personally have any communications with any sources for "*Jack of All Trades*."

21. While I am advised it is not germane to this motion, I certainly did not enter into any agreement, much less a conspiratorial scheme, to defame or otherwise harm Idema in connection with this Program. Contrary to the allegations in Paragraph 27 of the Complaint, I did not receive any call from Idema from an Afghan prison after the transcript of the Program was uploaded onto the ABC Internet server. Indeed, I never spoke with him either before or after the broadcast of the Program.

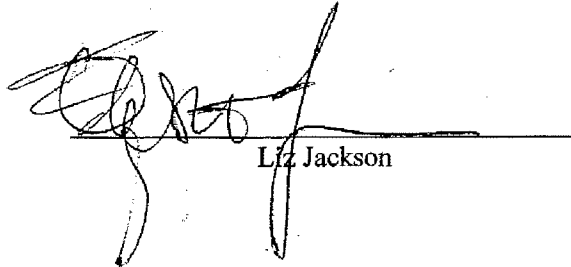
22. When preparing for and presenting the Program, I did not believe that this Program would have any consequence in New York; nor, for that matter, was there any reason to believe that the Program targeted New York in any way.

23. At the time we prepared the Program, I did not know Idema's residence. I knew only that he was a United States citizen and that he had been in Afghanistan for several years and was in prison there.

A handwritten signature in black ink, appearing to be 'D. G. ...', is written over the bottom right portion of the page.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Sydney, New South Wales, Australia, this 20 day of May, 2008.



Liz Jackson